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October 11, 2023

Hon. John P. Cronan
United States District Judge
U.S. District Court – Southern District of New York
500 Pearl Street
New York, NY

Re: 19-cv-2515 (JPC)

Dear Honorable Judge:

I am writing to respectfully inform you that while I did manage to put together the defendants' proposed findings of fact and conclusions of law, following a series of technical problems, personal health issues and family tragedies, it was hand-written and lengthy; I gave to someone to type it for me, and I've yet to receive it back for filing. To exacerbate matters further, as if not enough already, for some reason my calendar reminder is entered as October 17 – and looking at your Order, granting me an extension, it should be October 4.

Obviously, I cannot file the hand-written document. I do want to thank you for your kind understanding and granting me the extension; I did not mean to overlook this; as I told you, among everything else, my computer crashed and it has been very difficult without my files. Even my iPhone went out of commission, and I've had to change the device and the number. I am not in the office, I am in the Southwest trying to recover from a viral infection.

Since you indicated that I should not expect any further accommodations, I suppose that you will not accept the filing – which yesterday I reminded the person typing it for me to send it to me because it's coming due.

I just want to thank you, and ask that you accept my sincere apologies for the unfortunate lapses due to a series of serious impediments, as indicated.

Respectfully,

/s/ Ricardo R. Morel